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Class Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE CAPACITORS ANTITRUST
LITIGATION

Master File No. 3:17-md-02801-JD
Case No. 3:14-cv-03264-JD

THIS DOCUMENT RELATES TO:
THE DIRECT PURCHASER CLASS ACTIONS

**DECLARATION OF STEVEN N.
WILLIAMS IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' REQUEST
FOR JUDICIAL NOTICE**

Date: February 13, 2020
Time: 1:30 PM
Judge: Honorable James Donato
Courtroom: 11, 19th Floor

I, Steven N. Williams, declare as follows:

1. I am counsel for Direct Purchaser Plaintiffs in this matter. I make this declaration in support of the Direct Purchaser Class's Request for Judicial Notice. If called as a witness, I could and would testify to the following based on my personal knowledge. I make this declaration pursuant to 28 U.S.C. § 1746.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Plea Agreement of settled Defendant Elna Co., Ltd. in *U.S. v. Elna Co., Ltd.*, No. 4:16-cr-00365-JD (CAND), Dkt. No. 40, filed on October 12, 2017. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 651-11).

3. Attached hereto as **Exhibit B** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Elna Co., Ltd.*, No. 4:16-cr-00365-JD (CAND), Dkt. No. 59, filed on February 12, 2018.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Plea Agreement of settled Defendant Nichicon Corporation in *U.S. v. Nichicon Corporation*, No. 17-cr-00368-JD (CAND), Dkt. No. 19, filed on November 9, 2017. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 651-12).

5. Attached hereto as **Exhibit D** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Nichicon Corporation*, No. 17-cr-00368-JD (CAND), Dkt. No. 41, filed on April 24, 2018.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Plea Agreement of settled Defendant Rubycon Corporation in *U.S. v. Rubycon Corp.*, No. 4:16-cr-00367-JD (CAND), entered on October 12, 2016. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 651-13).

7. Attached hereto as **Exhibit F** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Rubycon Corp.*, No. 4:16-cr-00367-JD (CAND), Dkt. No. 38, filed on February 3, 2017.

8. Attached hereto as **Exhibit G** is a true and correct copy of the Plea Agreement of current Defendant Nippon Chemi-Con Corporation in *U.S. v. Nippon Chemi-Con Corporation*, No. 4:17-cr-00540-JD (CAND), Dkt. No. 54, filed on May 31, 2018. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 651-14).

9. Attached hereto as **Exhibit H** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Nippon Chemi-Con Corporation*, No. 4:17-cr-00540-JD (CAND), Dkt. No. 85, filed October 24, 2018.

10. Attached hereto as **Exhibit I** is a true and correct copy of the Plea Agreement of settled Defendant Hitachi Chemical Co., Ltd. in *U.S. v. Hitachi Chemical Co., Ltd.*, No. 4:16-cr-00180-JD (CAND), Dkt. No. 22, filed 06/10/16. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 676-4).

11. Attached hereto as **Exhibit J** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Hitachi Chemical Co., Ltd.*, No. 4:16-cr-00180-JD (CAND), Dkt. No. 31, filed July 12, 2016.

12. Attached hereto as **Exhibit K** is a true and correct copy of the Plea Agreement of settled Defendant NEC TOKIN Corporation in *U.S. v. NEC TOKIN Corporation*, No. 3:15-cr-00426-JD, Dkt. No. 9-1, filed on January 5, 2016. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 679-3).

13. Attached hereto as **Exhibit L** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. NEC TOKIN Corporation*, No. 3:15-cr-00426-JD, Dkt. No. 20, filed January 25, 2016.

14. Attached hereto as **Exhibit M** is a true and correct copy of the Plea Agreement of current Defendant Holy Stone Holdings Co., Ltd. in *U.S. v. Holy Stone Holdings Co., Ltd.*, No. 4:16-cr-00366-JD, Dkt. No. 34, filed on October 12, 2017. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 679-3).

15. Attached hereto as **Exhibit N** is a true and correct copy of the Judgment in a Criminal Case in *U.S. v. Holy Stone Holdings Co., Ltd.*, No. 4:16-cr-00366-JD, Dkt. No. 52, filed February 12, 2018.

16. Attached hereto as **Exhibit O** is a true and correct copy of the Plea Agreement of current Defendant Matsuo Electric Company Limited in *U.S. v. Matsuo Electric Co. Ltd.*, No. 4:17-cr-00073-JD, Dkt. No. 35, filed on October 26, 2017. This Plea Agreement was previously filed in Master Docket No. 3:17-md-02801-JD (Dkt. No. 679-3).

